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August 7, 2017

VIA ECF

Hon. Alison J. Nathan

United States Judge

Thurgood Marshall United States Courthouse

400 Foley Square

New York, New York 10007

SO ORDERED:

Handwritten signature
HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

8/8/17

RE: Mantel v. Microsoft Corp. et. al, 16-cv-05277

Dear Judge Nathan:

We represent all defendants in this action, including lead defendant Zazoom LLC (collectively, "Defendants"). Together with counsel for plaintiff John Mantel ("Plaintiff"), the parties respectfully request that the Court adjourn the current filing deadline for summary judgement motions, August 14, 2017, and enter order that implements the parties' agreed-upon briefing schedule set forth below.¹

SO ORDERED

Following the post-discovery conference in this case on July 14, 2017, the parties met and conferred regarding their respective plans for dispositive motion practice. Because the parties both intend to make motions for summary judgment pursuant to Fed. R. Civ. P. 56(a), the parties have conferred on a briefing schedule consistent with Section (3)(G)(viii) of Your Honor's individual practices. Based on these discussions, the parties have agreed on the following briefing schedule:

Deadline	Date
Plaintiff's Opening Brief	August 25, 2017
Defendants' Opening & Opposition Brief	September 22, 2017
Plaintiff's Opposition & Reply Brief	October 20, 2017
Defendants' Reply Brief	November 3, 2017

Thereafter, the parties will be prepared for oral argument on their respective motions on December 1, 2017, or as the Court may schedule such argument.

¹ The parties' stipulated briefing schedule is attached to this letter motion as Exhibit A and, consistent with the Local Rules, has also been submitted by e-mail to the orders and judgments clerk at the Southern District.

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August 7, 2017
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This application represents the parties' first request to adjourn the deadlines relating to summary judgement motions.

Counsel for both parties are available at the Court's convenience to discuss this or any other matter.

Respectfully Submitted,
**FRANKFURT KURNIT KLEIN &
SELZ P.C.**

/s/ Andrew J. Ungberg

Andrew J. Ungberg
Edward H Rosenthal
Attorneys for Defendants

cc: Richard Liebowitz
James H. Freeman
Attorneys for Plaintiff John Mantel

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN MANTEL,

Plaintiff,

v.

GANNETT COMPANY, INC., HEARST STATIONS, INC., HEARST NEWSPAPERS, LLC, TOSHIBA AMERICA INFORMATION SYSTEMS, INC., LENOVO (UNITED STATES) INC., GANNETT SATELLITE INFORMATION NETWORK, LLC, VERIZON SERVICES CORP., TEGNA, INC., MICROSOFT CORPORATION, AOL INC., AND ZAZOOM, LLC

Defendants.

Case No. 1:16-cv-05277

STIPULATED BRIEFING SCHEDULE

WHEREAS, Plaintiffs and Defendants each intend to file motions pursuant to Fed. R. Civ. P. 56(a) (together the "Motions") in the above-captioned case; and

WHEREAS, the parties have met and conferred regarding a briefing schedule for the Motions based on the procedures set forth in Section 3(G)(vii) of the Court's Individual Practices,

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel for Plaintiff

and all Defendants that:

1. The briefing schedule for the Motions shall be as follows:

Deadline	Date
Plaintiff's Opening Brief	August 25, 2017
Defendants' Opening & Opposition Brief	September 22, 2017
Plaintiff's Opposition & Reply Brief	October 20, 2017
Defendants' Reply Brief	November 3, 2017

2. The parties shall be ready for oral argument on the Motions as of December 1, 2017, or as the Court may schedule for counsel to be heard.

Dated: August 7, 2017

LIEBOWITZ LAW FIRM, PLLC

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Attorneys for Plaintiff John Mantel

SO ORDERED:
August 8, 2017

Dated: August 7, 2017

FRANKFURT KURNIT KLEIN & SELZ

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Hon. Alison J. Nathan, U.S.D.J.

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